

## UNITED STATES DISTRICT COURT

JUN 15 2018

for the  
Southern District of Texas

David J. Bradley, Clerk of Court

\_\_\_\_\_  
Division

EMMANUEL A.ADEYINKA

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

\_\_\_\_\_  
Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) ☒ Yes ☐ No

CHRISTOPHER FAGBOLU &amp; DOMAIN REGISTRAR

\_\_\_\_\_  
Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	EMMANUEL ADEYINKA
Street Address	10811 RICHMOND AVE 18
City and County	HOUSTON
State and Zip Code	TX 77042
Telephone Number	713-514-6288
E-mail Address	VERSIL@LIVE.COM

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## Defendant No. 1

Name	CHRISTOPHER FAGBOLU
Job or Title <i>(if known)</i>	
Street Address	1621 BAY BERRY LANE
City and County	TRACY
State and Zip Code	CA 95376
Telephone Number	1-800-658-5678
E-mail Address <i>(if known)</i>	COFAG@FAGBOLU.COM

## Defendant No. 2

Name	CHRISTOPHER FAGBOLU
Job or Title <i>(if known)</i>	1ST CLASS TRANSPORTATION INC
Street Address	P.O. BOX 250688
City and County	SAN FRANCISCO
State and Zip Code	CA , 94128
Telephone Number	1-415-462-2938
E-mail Address <i>(if known)</i>	ADMIN@1STCLASSCLIMOS.COM

## Defendant No. 3

Name	DOMAIN REGISTRAR
Job or Title <i>(if known)</i>	
Street Address	575 EIGHTH AVENUE 11TH FLOOR ,
City and County	NEW YORK
State and Zip Code	NY 10018
Telephone Number	212-626-9306
E-mail Address <i>(if known)</i>	DOMAINREGISTRAP@NAMEBARGAIN.COM

## Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

## b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I'm a victim of cyber-squatting. Christopher Fagbolu been buy my last name domain for about 16 year scene 02/17/2003 till now and just renew it on 01/19/2018 . I located the company that stolid it about a year ago and ask them why are they selling my last domain without my consent . They told me their was not to much I or they could do about . So wanted for it to expire date to come up to see if Christopher would still renew the domain after I located the selling company about my personal last name being stolid. Christopher still renew , I'm not related or don't know Christopher fagbolu.

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

EMOTION DISTRESS \$1,000,000,000

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_

Signature of Plaintiff \_\_\_\_\_

Printed Name of Plaintiff \_\_\_\_\_

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Street Address \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_